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TRAINING SPONSOR

Update

MDCIS - Asbestos Program

TRAINING ISSUES

ON-SITE COURSE AUDITS



Are you seeking guidelines that will help you maintain contingent approval or obtain full approval status? For everything you wanted to know about conducting a successful and fully approved training program, please review the following section:

On-Site Audit

An on-site review is conducted to ensure that certain criteria are met in a training course. The three areas the course auditor verifies are:

■ Student manuals.

Student manuals are mandatory. Each student is entitled to his/her own manual

for both the initial and refresher courses. If a student has previously taken your course and you use the same manual for the refresher course, then a take home manual is not required. Students must be reminded to bring their manuals to the course.

■ Mandatory topics.

Remember to use the course checklist to ensure all mandatory topics are being addressed in your course. Refresher courses do not require the same level of coverage as the initial course; however, each topic needs to be addressed.

■ Time.

Each training day is to be eight (8) hours in length per EPA. This suggests one half hour lunch; two (2) fifteen minute breaks; and seven hours of instruction. It is recommended that the time be carefully monitored so that instruction does not slip below seven hours. (Exception: The Inspector and Management Planner refresher courses are four (4) hours in length and allow one (1) fifteen minute break.)

Failure to adhere to any of the above-mentioned requirements could result in a citation with a monetary penalty and/or withdrawal of course approval. (

Training Course . . .

Recommendations

- ! Did you know the course auditor observes your students?
- ! Do you have students falling asleep?
- ! Are students late in returning from breaks or lunch?
- ! How do you address these issues?

Kee your course INTERESTING!! Here are a few techniques that can be used to keep your lectures interesting:

Ø **Stagger the lecture** with videos, slides, games, chalk/marker board, and especially hands-on activities. There are no rules as to when each topic is to be presented.

Ü **Mandatory topics** can be presented in a hands-on type format, i.e. discussion of shower-out techniques could be held at the decontamination area during an initial course. Lecturing on negative pressure enclosure techniques could be held within the enclosure.

Ü **Alternate instructors** or use guest professionals. A guest professional can provide insight into a topic. Remember, all instructors and guest professionals must be approved prior to their instruction/teaching.

Ü **Use practical and real life examples** to emphasize the topic. Everyone loves a good story.

Ü **Show enthusiasm for the subject.** A class will usually reflect the mood of the instructor. If the instructor is slumped over the manual reading in a monotone voice, guess what the class will be thinking? It will have little to do with asbestos!

Y **Controlled, frequent, short breaks** are more effective than two 15 minute breaks. (

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Training . . .

HOMOGENEOUS AREAS

During on-site investigations, we are encountering trained individuals who are unable to distinguish between homogeneous areas or correctly assess if all homogeneous areas have been addressed. We have also noted different homogeneous areas erroneously grouped together and incorrectly treated as negative. This inaccurate reporting could result in the disturbance of asbestos-containing material (ACM).

For example, one facility believed it only had beige floor tile located under carpeting which was listed as non-ACM in the management plan. In reality, there were five different colors of floor tile under the carpeting and one color tested positive for asbestos. During the renovation project, the maintenance supervisor reviewed the management plan and ascertained that there were no asbestos-containing materials within the room. Work progressed until one employee took several samples of the floor tile. Laboratory analysis revealed the presence of asbestos.

There were several circumstances that contributed to the events leading to the disturbance of the asbestos-containing floor tile. Since the room had carpeting over the existing floor tile, an inspector would not have known of the five different colors, and thus, would not have discovered the five separate homogeneous areas. Due to the fact that the floor tile was inaccessible to the inspector, a prudent approach would have been to assume the floor tile beneath the carpeting to be asbestos-containing. When the carpet was removed, the homogeneous areas could have been determined and sampled. Additionally, if the maintenance supervisor would have been aware that different colors and sizes

of floor tile resulted in different homogeneous areas, he could have averted the disturbance by sampling the floor tile at the time of discovery and hiring an asbestos abatement contractor to perform the abatement.

Individuals acquiring asbestos training, regardless of the level of training, should be aware of the difference in homogeneous areas. This will aid individuals reviewing renovation work to be performed and insure that all suspect or confirmed asbestos-containing materials have been properly identified and are appropriately handled. (

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Does Michigan approve out-of-state trainers?

The Michigan Model Accreditation Plan has a long established administrative policy of only processing/approving trainers that have an office located in the state of Michigan. This policy was established out of necessity due to the fact that a number of states never formally established their own EPA recognized model accreditation plan. As a result, many out-of-state trainers initially sought to have their courses approved by Michigan even though most never had any intent of actually training in our state. Therein lied the dilemma. EPA mandates that the training courses be physically audited by the approved state program. Therefore, in order for Michigan to fully approve these training courses, Michigan would have to conduct on-site reviews of these courses. Because of our limited resources and varying out-of-state travel restrictions, this is not possible. (

Accreditation

Did you know that . . .

Accreditation cards are printed once a week on Thursdays? Please note, individuals may drop off their Asbestos Accreditation Applications at the Asbestos Program office; however, the accreditation card will not be printed on that same day. Accreditation cards are also mailed on Thursdays. All information **MUST** be processed and reviewed before an accreditation card can be printed. Please allow two (2) weeks for processing!

Individuals seeking to pickup their accreditation cards must notify the Asbestos program before they come in to pick them up? Otherwise, the card will be mailed to the address on the application.

Accreditation cards can be sent to a different address? Companies or individuals seeking to have accreditation cards mailed to an address other than the applicant's, must contact the Asbestos Program and specify the specific address where the card is to be sent. Otherwise, cards will be mailed to the address on the application.

Individuals can receive monetary penalties or risk revocation of their asbestos accreditation if they submit fraudulent documentation of their social security number, training certificates, physicians written opinion, etc.? It must be emphasized that individuals may risk losing their livelihood by these actions, as well as, trigger a citation for their employer.

The expiration date of a training course and the expiration date of the state of Michigan accreditation card do not correspond? Therefore, an individual must have **both** current training and a current accreditation card to perform asbestos-related work within the state of Michigan. (

Student Certificates

It is the responsibility of the course sponsor to supply course certificates to all students who take and pass an approved course. The following information must be included on the training certificate:

- Student's name.
- **Student's social security number.**
- Name of training course.
- **Complete course date(s).**
- Expiration date.

Please note, not all training sponsors are including the full course dates for initial courses and are not providing the student's social security number on certificates. This information is essential for proper processing. (

Sponsor Certificates

In an attempt to streamline current operating procedures and make the renewal process easier for our approved trainers, the MDCIS-Asbestos Program has decided to extend the expiration date of the training courses until December 31. (

Training Lapse

An individual may **not** take a refresher course if that individual has not had training in that discipline within the past 24 months. For example, if an individual completed an inspector training course on January 5, 1998, that individual must acquire an inspector refresher course by January 5, 2000. After January 5, 2000, he/she would be required to take an initial inspector course. (

Michigan Certificates

A Michigan trainer cannot train outside of Michigan and issue Michigan certificates. (

TRAINING COURSE NOTIFICATIONS



Course Schedules

Training providers are required to provide a seven (7) day advance notice of upcoming courses. This notice affords the Asbestos Program an adequate amount of time to schedule an unannounced on-site course audit. The Asbestos Program also provides this information to prospective students seeking specific courses. Please be sure to submit accurate and current information so we do not inadvertently distribute outdated information regarding your course(s).

Training course schedules **MUST** include the name of the instructor as well as the time the course will be held. Please check it over before submitting to ensure its accuracy. If you use a form, check to see if all blanks are filled.

Please note, failure to provide notice of courses or changes in a scheduled course could subject your company to a fine of \$2,000 for a first violation.

To expedite processing, training course schedules should be faxed or e-mailed to kim.weaver@cis.state.mi.us. It is not necessary to both fax and mail course notifications.

Course Cancellations

As you are aware, the Asbestos Program cannot give advance notice to the training sponsor of an on-site review. Therefore, training sponsors are reminded that a cancellation notice for a previously schedule

course is required no later than one day prior to the first day of the scheduled course. This cancellation requirement is necessary in order to assist in performing efficient on-site course audits.

Failure to provide notice of cancellation for a scheduled course could subject your company to a fine of \$2,000 for a first violation.

Student Attendance List

Please supply the name, social security number, home address, and phone number of students who attend your course. ***This information should be faxed, e-mailed, or mailed to our office within ten (10) days of the last day of the course.***

Please note, failure to provide this list on a timely basis could result in a fine of \$2,000 for a first violation. (

Instructor Training

Should instructors take their own refresher course for accreditation?

In the state of Michigan, if an instructor teaches an approved course and submits their training certificate to the Asbestos Program, we will in turn honor the certificate for accreditation. However, we strongly suggest that instructors periodically take another training provider's course to get a different perspective on some of the required subject matter. In so doing, it may expose them to different material and training styles and thus, help enhance their course. (



ACCREDITATION

Can an abatement worker and a contractor/supervisor attend the same training course for accreditation?

The Asbestos Model Accreditation Plan (MAP); Interim Final Rule (40 CFR 763), dated Thursday, February 3, 1994, states, "Although EPA permitted this accommodation for a period of time under the original MAP, the Agency has now decided that, in light of the Congressional mandate to strengthen and improve asbestos-related training programs, contractor/supervisors may no longer obtain accreditation by attending the same training course as workers with a one (1) day add-on. Contractor/supervisors have markedly different job functions and responsibilities than workers. While many training elements are common to these two disciplines, each discipline requires presentation at a different degree of complexity and level of detail, depending upon whether a person is in training to become a worker, or in training to become a supervisor." Therefore, to become trained and accredited in an asbestos discipline requires training specific to that discipline. For further details, see below:

Abatement Worker

An individual seeking to become an Abatement Worker is required to complete the 32-hour initial course. To become recredited as an Abatement Worker, individuals **MUST** take the 8-hour Abatement Worker refresher course.

An individual **CANNOT** take the Contractor/Supervisor refresher course and expect



to become recredited as a worker. The re-accreditation of a worker require the Abatement Worker Refresher course. The two disciplines are not interchangeable.

Contractor/Supervisor

An individual seeking to become a Contractor/Supervisor is required to complete the 40-hour initial course. To become recredited as a Contractor/Supervisor, an individual **MUST** take the 8-hour Contractor/Supervisor refresher course.

If the Contractor/Supervisor initial course is taken, the individual will be accredited as a Contractor/Supervisor. An individual cannot take a Contractor/Supervisor initial course and become accredited as an Abatement Worker. An accreditation card will only be granted for the course discipline taken. The two disciplines are not interchangeable.

It is allowable, however, for an accredited contractor/supervisor to perform the work activities/functions of an accredited asbestos worker. (

What is required to become . . . An Inspector?

An individual seeking to become an Inspector is required to complete the 24-hour initial course. The individual must also submit a résumé detailing the asbestos related work experience acquired. The résumé should include the percentage of time spent in asbestos related work.

To become recredited as an Inspector, an individual must complete a 4-hour Inspector refresher course.

..... A Management Planner?

An individual seeking to become a Management Planner is required to complete the 24-hour Inspector initial course prior to completing the 16-hour initial course. The individual must also submit a résumé detailing the asbestos-related work experience acquired. Further, the résumé should include the percentage of time spent in asbestos-related work.

To become recredited as a Management Planner, an individual must complete a 4-hour Management Planner refresher course as well as the Inspector refresher course.

..... A Project Designer?

In the past, an individual was allowed to become a Project Designer by taking the Contractor/Supervisor Course. However, since 1994, EPA has required that an individual seeking to become a Project Designer must complete the 24-hour initial course. The individual must also submit a résumé detailing the asbestos-related work experience acquired. The résumé should include the percentage of time spent in asbestos-related work.

To become recredited as a Project Designer, an individual must complete an 8-hour Project Designer refresher course. (

What class work is . . .

Joint Compound?

Based upon Federal OSHA's interpretation, the Asbestos Program does not treat *asbestos-containing drywall joint compound* as a Class I material as defined in 29 CFR 1926.1101. Asbestos-containing joint compound is regulated under Class II work activities and is subject to those requirements.

This interpretation is supported by the definition of Class II asbestos work. "Class II asbestos work" means activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of *asbestos-containing wallboard*, floortile and sheeting, roofing and siding shingles, and construction mastics. Past experience indicates that wallboard in itself seldom contains asbestos; the asbestos is generally a constituent of the joint compound, spackling compound and tape used to produce a smooth wall surface.

However, because OSHA has declared these materials to be part of a *wallboard system*, they are considered a Class II material. (

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General Contractors and Subcontractors

Due to the nature of the construction/renovation business, contractor employees may perform job duties that encounter asbestos-containing material. Therefore, it is important that employees of contractors receive asbestos awareness training covering the recognition of all building materials that may contain asbestos, the health hazards associated with asbestos exposure, and the MIOSHA regulations involving asbestos. This training must be provided by an individual(s) who is knowledgeable of the subject matter. This type of minimum training is required by MIOSHA Rule 6601 for all employees with the potential for disturbing the asbestos-containing material. (

ON-SITE INVESTIGATION ASBESTOS ABATEMENT FINDINGS



The Asbestos Program is responsible for investigating the asbestos abatement activities of contractors, exempt trade groups, and others in the state of Michigan. The program responds to complaints of improper work practices or procedures involving asbestos abatement and disturbance activities. If noncompliance is proven, citations may be proposed with monetary fines. Common violations or deficiencies determined during investigations are as follows:

- Friable asbestos debris visible after job completion. (Lock-down is not a substitute for cleaning up all visible asbestos containing material.)
- Lack of properly trained and accredited individuals on-site and lack of readily available documentation, especially when exempt trade groups are involved.
- Failure to have a competent person responsible for an asbestos abatement project.
- Improper decontamination, such as exiting without showering, wearing personal clothing previously worn in the containment, etc. This is also a concern with consultants and air monitoring personnel.
- Inadequate record keeping, such as incomplete medical surveillance forms, incomplete air monitoring records, etc. Air sampling results must be referenced to specific workers if representative sampling is performed in lieu of 100% individual monitoring. A worker's activities as well as the times periods of monitoring must also be noted.

For Fiscal Year 1998/1999, work practice violations (respirators/respirator programs, protective clothing, regulated area, etc.) comprised more than 45% of all violations. Violations presented in frequency order for that time period are as follows:

- Inappropriate engineering and work practices controls for employees.
- Inadequate cleanup of all asbestos-containing debris following abatement projects.
- Failure to communicate asbestos hazards to employees.
- Failure to conduct initial employee asbestos exposure assessments.
- Failure to develop hazard communication programs.

The Asbestos Program is given the authority to conduct investigations and issue citations based on Act 154, P.A. 1974, as amended, [the Michigan Occupational Safety and Health Act]; Act 135, P.A. 1986, as amended, [the Asbestos Abatement Contractors Licensing Act]; and Act 440, P.A. 1988, as amended, [the Asbestos Workers Accreditation Act]. (

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Asbestos Disturbance

During a construction project, a situation may arise where all asbestos-containing material may not have been identified in the asbestos building survey. Consequently, during the renovation, asbestos-containing material may be disturbed. Presented below are procedures to follow in the event asbestos-containing material is dislodged or disturbed:

- Restrict entry into the area and post signs to prevent entry into the area by persons other than those necessary to perform the response action.
- Shut off or temporarily modify the air-handling system to prevent the distribution of fibers to other areas in the building.
- Contact persons appropriately trained and accredited to conduct the cleanup. (

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Update



CONTRACTOR ISSUES

DEMOLITION

So, you plan to demolish a building, should you be concerned about asbestos containing materials (ACM)? Demolition activities are regulated by the OSHA Construction Standard for Asbestos (29 CFR 1926.1101) and the National Environmental Standard for Hazardous Air Pollutants (NESHAP).

Whether the facility contains Class I or Class II materials, demolition involving ACM requires a 40-hour trained competent person.

Demolition involving a facility containing Class I materials requires 32-hour trained workers; air monitoring; the use of proper work practices and procedures; and respiratory protection. Demolition of buildings containing Class II materials requires a 40-hour competent person and 8-hour trained workers; air monitoring; and the use of proper work practices and procedures. If the Class II material does not



This is a mechanical demolition project (note the missing hard hat).

remain in a substantially intact state, adequate respiratory protection would also be required.

In all cases involving the demolition of a building, trained individuals, air monitoring and the use of proper work practices are a necessity. Please note, the Construction Standard for Asbestos, 29 CFR 1926.1101, is triggered when any amount of asbestos-containing material is removed or disturbed.

Please contact the Michigan Department of Environmental Quality (DEQ), Air Quality Division if you have questions in regards to the types of asbestos materials that may remain in a building that is to be demolished and for any additional NESHAP requirements.(

Asbestos-Containing Roofing

In Federal Register, Vol. 63, No. 124, dated June 29, 1998, OSHA amended the Asbestos Standard for Construction (29 CFR 1926.1101) by removing asbestos-containing asphalt roof coatings, cements, and mastics from the scope of the standard. This change impacts paragraph (g)(8)(ii) and (g)(11) of the standard. Paragraph (g)(8)(ii) covers work practices and engineering controls for the removal of buildup roofs. Paragraph (g)(11) regulates the removal of roof flashings and asphalt pipe wrap.



In paragraph (g)(11), OSHA deleted all reference to asbestos-containing asphalt roof coatings, cements, and mastics. Therefore, where an employer installs, removes, repairs, or maintains roofs which only contain these materials; no designated asbestos-related training, engineering controls, or work practices are required. (Please see the Asbestos Standard for Construction for more detail.)

This change does not affect the General Industry Asbestos Standard.(

EXEMPT



TRADE



GROUPS



Did you know you could be subject to extensive personal liability if you perform asbestos removal or disturbance activities that are not properly contained to prevent asbestos contamination of a building structure? Therefore, it is important that employees of contractors receive asbestos awareness training covering the recognition of all building materials that may contain asbestos, the health hazards associated with asbestos exposure, and the MIOSHA regulations involving asbestos. This training must be provided by an individual(s) who is knowledgeable of the subject matter. This type of minimum training is required by MIOSHA Rule 6601 for all employees with the potential for disturbing the asbestos-containing material.

If you are evaluating the possibility of performing asbestos abatement, please be aware that on February 9, 1990, the state of Michigan passed Public Acts 2 through 6 which exempts "licensed" plumbers, electricians, mechanical contractors, residential buildings, and maintenance and alteration contractors from the asbestos abatement contractors licensing requirements of Act 135 of the Public Acts of 1986, as amended, provided that the asbestos abatement work they perform is incidental to their primary licensed trade and the project involves no

more than 160 square feet or 260 linear feet of friable asbestos-containing materials.

However, it must be emphasized that although these licensed trade groups are exempt from the asbestos abatement contractor licensing requirements as specified by the Asbestos Abatement Contractor Licensing Act (Public Act 135 of 1986, as amended), they have many other legal obligations under Act 135; the Asbestos Worker Accreditation Act (Public Act 440 of 1988, as amended); and Michigan's Asbestos Standard for Construction (Federal OSHA's 29 CFR 1926.1101). These obligations are as follows:

- Communication of Hazard and Training -- 29 CFR 1926.1101(k), the Federal OSHA Asbestos Construction Standard, Act 440 of 1988, as amended, and Rule 6601(2)(b), MIOSHA General Construction Requirements.
- Work Practices and Procedures -- the Federal OSHA Asbestos Construction Standard, 29 CFR 1926.1101.
- Project Notification -- Section 220 (2) of Act 135, P.A. 1986, as amended.
- Project Fee Requirements -- Section 220 (4) of Act 135, P.A. 1986, as amended.

Acts 3 through 6 also grant the authority to the licensing boards of the plumbers, electricians, mechanical contractors, residential builders, and maintenance and alteration contractors to revoke or suspend these trade licenses for violations of the Asbestos Abatement Contractors Licensing Act, Act 135, P.A. of 1986, as amended.

In conclusion, those licensed trades authorized to perform asbestos abatement work under the exemption granted in section 207 (2)(a-d) of Public Act 135 of 1986, as amended, have many legal rules and obligations with which to comply. ***Failure on a contractor's part to understand these obligations not only exposes them to stiff civil penalties and the potential loss of their primary license, but it can also expose them to substantial liability.*** (

ASBESTOS-CONTAINING FLOORING MATERIAL



QUESTIONS AND ANSWERS

This clarification is in response to questions pertaining to asbestos-containing vinyl and/or asphalt floor material removal projects (i.e., engineering controls, training, respiratory protection, etc.). The following clarifications are not intended to supersede any provision of the MIOSHA Asbestos Construction Standard (29 CFR 1926.1101) or any other state or federal laws.

What "Class" is floor tile removal?

The removal of asbestos-containing flooring materials and their associated mastics is considered as Class II under the MIOSHA Asbestos Construction Standard (29 CFR 1926.1101).

Are negative pressure enclosures required to remove vinyl and/or asphalt floor materials?

When the methods utilized are deemed as "mechanical chipping," "aggressive" in nature as specified in the Flooring Industry Settlement Agreement, or the flooring material is being removed in a non-intact state, then a negative pressure enclosure pursuant to 29 CFR 1926.1101(g)(5)(i) is required.

What is meant by "mechanical chipping" pursuant to 29 CFR 1926.1101(g)(8)(i)(F)?

First, because the term "mechanical" is not defined within 29 CFR 1926.1101, we must refer to a standard dictionary definition of the term. "Mechanical" is commonly defined as "Of or pertaining to machines or tools." Further, a "tool" is commonly defined as "Any hand-held implement (i.e., hammer, saw, drill, etc.) used to accomplish work." Therefore, when any type of tool or implement (i.e., long handled hand-held spud) is utilized in the removal of vinyl and/or asphalt floor material, the work is considered to be "mechanical" in nature.

Secondly, because the term "chipping" is not defined within 29 CFR 1926.1101, we again

must refer to a standard dictionary definition of the term. "Chipping" is commonly defined as "To break a small piece from; to chop or cut with an ax or other implement." Therefore, when small pieces, dust, and debris originating from the floor material are generated as a result of the removal, it may be considered as "chipping."

Are you required to provide written notification to the MDCIS prior to conducting asbestos-containing floor material removal projects?

No, provided that the method utilized to perform the removal does not render the floor material friable (i.e., an asbestos-containing material that can be crumbled, pulverized, or reduced to powder with hand pressure).

Is clearance/post-abatement air sampling required on Class II floor material abatement projects?

No, unless the method utilized to perform the removal rendered the floor material friable, the project was conducted utilizing a full negative pressure enclosure, and the quantity of material removed exceeded 15 square feet. If all three of these events were to occur, then at least one clearance/post-abatement air sample would be required.

What work practices are required to remove asbestos-containing floor materials and their associated mastics?

All asbestos-containing product removal operations have generic requirements specified at 29 CFR 1926.1101(g)(1). Further, the general work practices and engineering controls required for the Class II removal asbestos-containing floor materials and their associated mastics are specified by 29 CFR 1926.1101(g)(7). Additional controls for Class II asbestos-containing floor materials and their associated mastics are contained within 29 CFR 1926.1101(g)(8)(i).



Are respirators required to be worn when removing asbestos-containing floor materials and their associated mastics?

Yes, until the employer has created a valid negative exposure assessment (NEA) or if the floor materials are being removed in a "non-intact" state regardless of air monitoring results. If an employer utilizes the work practices and engineering controls specified by 29 CFR 1926.1101 and the "Occupational Exposure to Asbestos - Flooring Industry Settlement Agreement", the floor material remains substantially intact and employee exposures are below all permissible exposure limits (PEL's), then respiratory protection may not be required. However, good industrial hygiene practices may warrant the use of them.

What type of decontamination facilities are required for Class II asbestos-containing floor material abatement projects?

None, provided that the floor materials being abated are removed substantially intact without "mechanical chipping." If the materials do not stay "substantially intact" and require the use of a negative pressure enclosure pursuant to 29 CFR 1926.1101(g)(5)(i) or if the PEL's are

exceeded and/or a NEA can't be created for the project, the use of an "equipment room or area" as specified by 29 CFR 1926.1101(j)(2) is required.

What type of training is required to perform Class II asbestos-containing floor material abatement projects?

The "worker" training shall include, at a minimum, all elements of paragraph (k)(9)(viii) and the specific work practices and engineering controls set forth in paragraph (g) which specifically relate to the category of material being removed (i.e., vinyl floor tile, linoleum, etc.). The training shall be at least eight hours in length and include "hands-on" training.

The "competent person" training, where the floor materials are removed utilizing compliant work practices and the material remains "substantially intact" during removal, shall be a minimum of twelve hours in length and cover all of the topics specified in the "Occupational Exposure to Asbestos - Flooring Industry Settlement Agreement's Appendix A, Sections 1 through 14."

The aforementioned worker and contractor/supervisor training shall be provided by "a knowledgeable person (i.e., a person who qualifies as a 'competent person' for the particular type of asbestos work addressed in the training)." It is recommended that this training be provided by an EPA or Michigan approved training provider.

How must asbestos-containing floor materials be disposed?

During Class II asbestos-containing floor material abatement projects, pursuant to 29 CFR 1926.1101(l)(2), "asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing consigned for disposal shall be collected and disposed of in sealed, labeled, impermeable bags or other closed, labeled, impermeable containers." MIOSHA regulations do not address disposal regulations. The Michigan Department of Environmental Quality, Air Quality Division, enforces the National Environmental Standard for Hazardous Air Pollutants (NESHAP) which address waste shipment records and proper disposal methods.

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The "Training Sponsor Update" is published periodically by the Michigan Department of Consumer and Industry Services (MDCIS), Asbestos Program; which is responsible for assuring that people working with asbestos or individuals performing asbestos abatement activities are properly trained and comply with rules governing the work activity.

The purpose of the "Training Sponsor Update" is to educate Michigan training providers, contractors and other interested parties; offer suggestions; and present updated information in regards to asbestos. It is hoped that this information will improve course content and structure as well as inform others of asbestos-related matters.

This document is in the public domain and we encourage reprinting.

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